

## **REMARKS**

Applicants reply to the Final Office Action dated August 22, 2007, within three months. Applicants request that the Examiner consider these remarks prior to examining the above-referenced patent application after RCE. Claims 1-3, 5, 7-15, 17-22, 24-26, 28, 30, 32, and 33 were pending in the application and the Examiner rejects claims 1-3, 5, 7-15, 17-22, 24-26, 28, 30, 32, and 33. Support for the amendments may be found in the originally filed specification, claims, and figures. No new matter has been introduced by these amendments. Reconsideration of this application is respectfully requested.

Applicants thank the Examiner for the Interview with Applicants' counsel on October 11, 2007. As discussed during the interview, the Examiner asserted that the automatic features, "answer database", and "proposed itinerary" were unique elements, so Applicants expanded upon such features in the claims. Applicants also significantly amended the claims to clarify the travel specific features, and to emphasize the various other differentiating features such as, for example, the complex parsing of requests to extract questions and providing a preexisting answer to the question if one is available and sending the question to a destination expert if an answer is not available.

### **Rejection under 35 U.S.C. § 112**

The Examiner rejects claims 1, 8, 13, 20, and 33 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Examiner asserts that the specification does not provide support for the claim element of, "compiling offer data regarding the most frequently requested destination based on information stored in the answer database *relating to a subset of customers*, wherein the offer data is used to select an offer relevant to offer data *for presentation to the customer*" (page 2, item 4). Applicants have amended the claim element to more clearly recite the presentation of an offer based on a determination of a destination to which a plurality of requests are forwarded by the destination expert server.

### **Rejection under 35 U.S.C. § 103(a)**

The Examiner rejects claims 1-3, 5, 7-15, 17-22, 24-26, 28, 30, and 32 under 35 U.S.C. § 103(a) as being unpatentable over Taufique, WO 01/20518 A1 ("Taufique"), in view of Lauffer, U.S. Patent No. 6,223,165 B1 ("Lauffer"), in view of Gerace, U.S. Patent No. 5,991,735

("Gerace"), and in further view of DeLorme et al., U.S. Patent No. 5,948,040 ("DeLorme"). Applicants respectfully traverse this rejection.

Applicants note that the Examiner has acknowledged claim 33 as pending in the Disposition of Claims, however, the Examiner has not recited the claim in the 35 U.S.C. § 103(a) rejection.

Taufique is limited to a unique configuration of a "help" utility as is frequently employed in current web sites. Many product web sites offer their customers several options for obtaining help, which may include, for example, a frequently asked questions web page, a knowledge base and a live help link. A frequently asked questions (FAQ) web page is usually compiled from a database of previously asked and answered questions, which usually requires an end user to review a list of questions to find one similar to their own. A knowledge base is very similar to a FAQ, although it usually requires the end-user to enter a specific question, which is used to automatically conduct a database search for similar questions, which have been previously answered. A list of results is displayed for the user, which include a short excerpt to help the user better determine whether the answer is relevant to their question. The user then selects an answer from the list to perform a more thorough analysis. Thus, requiring a user to identify a relevant answer from a list of answers can be time consuming and does not always provide the user with the best answer available.

Lauffer is limited to a system for delivering advice to consumers via a server unit that stores and displays the names and characteristics of experts, and then assists in connecting the expert and consumer for real-time communication. The server unit also has the ability to receive keywords from the consumer, match those keywords to one or more experts, and then tell the consumer how to contact an expert. The Lauffer system also includes a visual display of available experts that may be presented to consumers (col. 6, line 30 - col. 7, line 67). In addition, Lauffer teaches having the consumer compensate the expert, either directly or indirectly (col. 8, lines 1-53). In all embodiments disclosed by Lauffer, the consumer and expert establish a connection, wherein the consumer and expert communicate interactively with each other (e.g., see col. 8, line 56 - col. 9, line 22).

DeLorme discloses a new Travel Reservations and Information System (TRIPS) that allows users to design a travel itinerary that is compiled based on a series of questions presented to the user. Specifically, the DeLorme system provides an interface, whereby a series of travel-

related questions are presented to, and then answered by, the user. The questions include, for example, when, where, what to do, who to visit, and how to get there. The answers to the questions are then used by the DeLorme system to construct an itinerary, and then shop the itinerary to various providers of travel services such as hotels, airlines, and car rentals. After obtaining a number of quotes for the required travel services, they are presented to the user who may compare them side-by-side. DeLorme further discloses a TRIPS system that can make reservations based on a selected itinerary, print airline tickets, theatre tickets, rental vouchers, maps, and the like.

Gerace generally discloses a system for tracking user behaviors on the Internet in order to more accurately target marketing campaigns. Specifically, the Gerace system provides targeting of an advertising audience based on psychographic and/or behavioral profiles relating to Internet users. The Gerace system constructs a psychographic profile by recording computer activity and viewing habits of the user. Using a user specific profile, with or without additional user demographics, advertisements are displayed to appropriately selected users. Through a process of regression analysis of recorded responses of users viewing the advertisements, the target user profile is refined over a period of time to progressively provide more precise targeting.

In summary, DeLorme generally discloses a system directed toward compiling a travel itinerary based on a consumer's answers to a series of questions. Contrary to the presently claimed invention, the DeLorme system asks travel related questions and the consumer provides the answers. Moreover, DeLorme is not concerned with receiving a destination specific request from the consumer and analyzing the request to determine which parts of the request may be processed by an automated system, and which parts need to be processed by a human (i.e., destination expert).

Taufique and Lauffer generally disclose systems for providing answers and advice to computer users. Taufique discloses a system, wherein a user enters a search term and the system retrieves a number of related results. However, the user must review the results and determine which of the results to select for closer review. Lauffer provides an interface between experts and questioners. However, as in DeLorme and Taufique, Lauffer lacks the sophistication to parse user requests for automated processing. Gerace also does not disclose such unique parsing of travel related requests. Accordingly, neither Taufique, Lauffer, DeLorme, Gerace, nor any combination thereof, disclose or suggest a destination expert server configured to:

- determining a destination expert to which a plurality of requests from a plurality of customers are forwarded by the destination expert server, wherein the destination expert is knowledgeable of a particular destination
- presenting an offer related to the particular destination to the customer
- identifying a plurality of experts, wherein the plurality of experts are in selective communication with the destination expert server
- receiving, from the customer, a request comprising at least one of: customer data and destination question data, wherein the request is received by the destination expert server and, wherein the request is related to a desire of the customer to create travel plans
- associating the customer data with the destination question data and storing the association in the answer database, wherein said answer database includes a plurality of travel answers previously provided by said plurality of experts
- parsing the request to determine when the request includes destination question data;
- determining whether the request is formatted to enable an automatic search of the answer database
- when the request is formatted to enable an automatic search of the answer database:
  - automatically retrieving an answer database response to the request from the answer database, wherein the retrieving step is performed automatically by said destination expert server without intervention by the destination expert and the customer, such that the answer database response includes a retrieved answer and a proposed itinerary
- when the request is not formatted to enable an automatic search of the answer database:
  - facilitating a selection, based on the request, of the destination expert from the plurality of experts, wherein the destination expert has particular knowledge about the destination city
  - forwarding, by the destination expert server, the request to the destination expert to facilitate the destination expert to communicate with the customer to provide a response to the request
  - sending the request to the destination expert to obtain a destination expert response including a proposed itinerary, wherein the proposed itinerary is based upon the particular knowledge of the destination expert related to the destination

city, and wherein the destination expert response further includes an offer to book reservations for the proposed itinerary

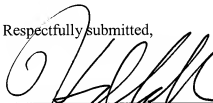
- providing at least one of: the answer database response and the destination expert response to the customer

as similarly recited by amended independent claims 1, 8, 13 and 20.

Dependent claims 2, 3, 5, 7, 9-12, 14, 15, 17-19, 21, 22, 24-26, 28, 30, 32, and 33 variously depend from independent claims 1, 8, 13 and 20. As such, dependent claims 2, 3, 5, 7, 9-12, 14, 15, 17-19, 21, 22, 24-26, 28, 30, 32, and 33 are allowable for at least the reasons described above with respect to independent claims 1, 8, 13 and 20, as well as in view of their own respective features.

Applicants respectfully submit that the pending claims are in condition for allowance. No new matter is added in this Reply. Reconsideration of the application is thus requested. The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account No. 19-2814. Applicants invite the Examiner to telephone the undersigned, if the Examiner has any questions regarding this Reply or the present application in general.

Respectfully submitted,

  
Howard I. Sobelman  
Reg. No. 39,038

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**SNELL & WILMER L.L.P.**

400 E. Van Buren  
One Arizona Center  
Phoenix, Arizona 85004  
Phone: 602-382-6228  
Fax: 602-382-6070  
Email: [hsobelman@swlaw.com](mailto:hsobelman@swlaw.com)